IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

FEDERAL EXPRESS CORPORATION

Plaintiff,

v.

MY PILLOW, INC. and MICHAEL J. LINDELL

Defendant.

Civil Action No. 2:25-cv-02222-JPM-atc

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Federal Express Corporation hereby requests the Clerk enter default as to defendants My Pillow Inc. and Michael J. Lindell in the above numbered and styled cause.

Plaintiff filed this civil action on February 27, 2025 (Dkt. No. 1) against My Pillow Inc. and served My Pillow Inc. with the Original Complaint on March 4, 2025 (Dkt. No. 12). A First Amended Complaint was filed on June 6, 2025 adding claims against Michael J. Lindell (Dkt. No. 13). Both My Pillow Inc. and Michael J. Lindell were served with the First Amended Complaint on June 6, 2025 (Dkt. Nos. 15 and 16). Neither of these defendants have responded to or otherwise answered the Original Complaint or the First Amended Complaint despite their deadlines to do so, which have long passed. Accordingly, Plaintiff requests the Clerk enter default as to both defendants so that Plaintiff may proceed with a Motion for Default Judgment to establish the damages to be awarded as to each defendant.

Dated: July 7, 2025 Respectfully submitted,

/s/ Jason R. Bernhardt

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